

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
LISA ANN GALAZ,	§	Case No. 07-53287 rbk
	§	
Debtor.	§	Ch. 13

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LISA ANN GALAZ,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	ADVERSARY NO. 11-05015 rbk
	§	
WORLDWIDE SUBSIDY GROUP, LLC	§	
DENISE VERNON, and	§	
MARIAN OSHITA,	§	
	§	
Defendants.	§	

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**DENISE VERNON'S ANSWER TO PLAINTIFF'S VERIFIED COMPLAINT,  
APPLICATION FOR TURNOVER AND APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION AND COUNTER-CLAIM**

**TO THE HONORABLE JUDGE RONALD B. KING:**

Defendant, **DENISE VERNON**, files this Answer to Plaintiff's Verified Complaint, Application for Turnover and Application for Temporary Restraining Order and Preliminary Injunction and Counter-Claim and for cause would show unto the Court the following:

I.

**ANSWER TO PLAINTIFF'S VERIFIED COMPLAINT,  
APPLICATION FOR TURNOVER AND APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

1. Admitted.
2. Admitted. WSG is designated as a nominal party.

3. Denise Vernon need not admit or deny.
4. Denise Vernon need not admit or deny.
5. Subject to the Mediated Settlement Agreement signed by the parties on May 08, 2008, denied.
6. Denied.
7. Admitted.
8. Admitted.
9. Denise Vernon need not admit or deny.
10. Admitted.
11. Admitted.
12. Admitted. The last sentence is denied. Denise Vernon does not believe that Marian Oshita has an interest in WSG.
13. Admitted as to the 1<sup>st</sup> and 2<sup>nd</sup> sentences; denied as to the 3<sup>rd</sup> sentence.
14. Denied.
15. Denied.
16. Denied.
17. Denied.
18. Admitted.
19. Denied; all of the disputes were mediated, otherwise admitted.
20. Denied; Denise Vernon is not aware of what the Court knows, and disputes regarding the operation of WSG have not existed or “persisted year after year”.
21. Denied.
22. Denied.
23. Denied.
24. Denied.
25. Denied.
26. Denise Vernon cannot admit or deny the first sentence. Second sentence is admitted. The third sentence is admitted. The fourth sentence is denied.
27. Denied.

28. Admitted.
29. Denied.
30. Denied.
31. Denied.
32. Denied.
33. Denied.
34. Denise Vernon need not admit or deny.
35. Denise Vernon need not admit or deny.
36. Denise Vernon need not admit or deny.
37. Denise Vernon need not admit or deny.
38. Denise Vernon need not admit or deny.
39. Denise Vernon need not admit or deny.
40. Denise Vernon need not admit or deny.
41. Denise Vernon need not admit or deny.
42. Denise Vernon need not admit or deny.
43. Denied.
44. Denise Vernon need not admit or deny.
45. Denied.
46. Denise Vernon need not admit or deny.
47. Denise Vernon need not admit or deny.

II.

**COUNTER-CLAIM**

**DENISE VERNON** files this Counter-Claim against Lisa Galaz and would show unto the Court the following:

On April 17, 2008, in Adversary Proceeding 08-05043-rbk, Lisa Galaz filed her Application for Receiver over Worldwide Subsidy Group, LLC. On May 8, 2008, Lisa Galaz, Denise Vernon and Raul Galaz entered into a Mediated Settlement Agreement to fully resolve all

aspects of the pending action for a receiver, and Lisa Galaz agreed that such action would be dismissed with prejudice.

This Court approved and confirmed the Mediated Settlement Agreement which on is file in the underlying principal case, and dismissed with prejudice Lisa Galaz's adversary proceeding for appointment of a receiver. Lisa Galaz's Motion for Receivership violates the Mediated Settlement Agreement.

The authority to interpret the Mediated Settlement Agreement and any issues arising therefrom rests with the Honorable Judge John Specia.

As such, Lisa Galaz is in breach of the terms of the Mediated Settlement Agreement. Denise Vernon seeks damages and attorney's fees incident to and arising out Lisa Galaz's motion and breach.

WHEREFORE, PREMISES CONSIDERED, Defendant, **DENISE VERNON**, prays that Lisa Galaz's motion be in all respects denied, that she be granted such damages and attorney's fees as may be proven, and for such other and further relief to which she may be justly entitled.

Respectfully submitted,

/s/ Richard P. Corrigan

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ATTORNEY FOR DENISE VERNON

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of April, 2011, a true and correct copy of the above and foregoing has been served by electronic means through CM/ECF system; certified mail, return receipt requested, postage prepaid; United States First Class mail, postage prepaid; overnight delivery; facsimile transmission; and/or hand delivery, on the parties listed below:

Royal Lea  
Bingham & Lea, P.C.  
319 Maverick St.  
San Antonio, TX 78212

Mary K. Viegelahn  
Chapter 13 Trustee  
909 NE Loop 410, Suite 400  
San Antonio, TX 78209

Office of the U.S. Trustee  
P.O. Box 1539  
San Antonio, TX 78295

/s/ Richard P. Corrigan  
RICHARD P. CORRIGAN